

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Chapter 7

Bankruptcy No. 22-31881

Matthew Fred Whebbe,

Debtor.

**APPLICATION FOR EMPLOYMENT
OF AGENT, APPRAISER, AUCTIONEER OR COLLECTION AGENT**

Mary Jo A. Jensen-Carter, the trustee of the estate of the above-named debtors hereby applies for approval of the employment of Todd M. Kosta of Woodworth Commercial, LLC, 4277 Okemos Road, Okemos, MI 48864 as a real estate broker to find a tenant and lease the following property:

Commercial building and land located at 340 E. Edgewood, Lansing, MI 48911 and a Vacant 1 acres outlot on E Edgewood, Lansing, MN. Parcel Id #33-01-05-09-403-014 and Parcel ID 333-01-05-09-403-015

The terms and conditions of compensation are as follows:

Broker will be paid a 6% commission of the gross rent received.

Said professional has disclosed to the undersigned that he/she has the following connections with the debtor(s), creditors, and other parties in interest: Applicant had been employed by Juniper II, LLC to manage and sell the property prior to the debtor's Chapter 7 filing.

Dated: October 17, 2023

/e/ Mary Jo A. Jensen-Carter
Mary Jo A. Jensen-Carter, Trustee
1257 Gun Club Road
White Bear Lake, MN 55110
(651) 486-7475

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**VERIFIED STATEMENT
OF PROPOSED AGENT**

Todd M. Kosta, Vice President of Woodworth Commercial, LLC, submits the following verified statement in connection with the proposed employment as real estate agent for the trustee in the above captioned matter as follows:

1. He and/or his company have the following connections with the following parties

(all answers are NONE unless otherwise indicated):

a. The debtor: Applicant was employed by Matthew Fred Whebbe, principal of Juniper II, LLC to manage and market the property prior to the Chapter 7 filing. Applicant is also currently employed by the bankruptcy estate to sell the real property

b. Creditors:

c. Any other party in interest, their respective attorneys and accountants:

d. The United States Trustee or any person employed in the office of the United States Trustee: _____

2. That he and his company are not a creditor, equity security holder, or insider of the debtor; are not and were not an investment banker for any outstanding security of theirs; are not and have not been within three years before the date of the filing of the petition an investment banker for security of the debtor or any attorney for such an investment

banker in connection with the offer, sale or issuance of the security of the debtor; are not and were not within two years prior to the date of the filing of the petition, a director, officer, or employee of the debtor or of an investment banker specified above; and do not have an interest materially adverse to the interest of the estate or any class of creditor or equity security holders by reason of any direct or indirect relationship to or connection with or interest in the debtor or an investment banker specified above or for any other reason.

3. That there are no agreements with the debtor or any other person for the division of any fees which may be allowed pursuant to this Application which division is prohibited by 11 U.S.C. Section 504.

I, Todd M. Kosta, Vice President of Woodworth Commercial, LLC, declare under penalty of perjury that I have read the foregoing Verified Statement of Proposed Agent and that it is true and correct to the best of my knowledge, information and belief.

Dated: October 17, 2023



Todd M. Kosta

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UNSWORN CERTIFICATE OF SERVICE

I, Cassandra Jo Warner, declare under penalty of perjury that on October 17, 2023, I served copies of the attached **Application for Approval of Employment of Agent, Verified Statement of Proposed Real Estate Agent, and proposed Order** upon the following individuals by e-mail:

Office of the U.S. Trustee
email: USTPRegion12.MN.ECF@usdoj.gov

Dated: October 17, 2023.

Signed: /e/ Cassandra Jo Warner
Cassandra Jo Warner
Buckley & Jensen
1257 Gun Club Road
White Bear Lake, MN 55110
(651) 486-7475

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ORDER

The trustee's application to approve the employment of Woodworth Commercial, LLC as the trustee's real estate agent came before the court.

Based on the application, the recommendation of the United States Trustee and 11 U.S.C. § 327,

IT IS ORDERED: the employment is approved

Dated:

Katherine A. Constantine
United States Bankruptcy Judge